

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS SIERRA)	
)	Case No. 18 CV 3029
Plaintiff,)	
)	Hon. John Robert Blakey,
v.)	District Judge
)	
REYNALDO GUEVARA et al.)	
)	JURY TRIAL DEMANDED
Defendants.)	
)	

**SIERRA’S LOCAL RULE 56.1 STATEMENT OF FACTS IN SUPPORT OF HIS
CROSS-MOTION FOR PARTIAL SUMMARY JUDGEMENT EXHIBIT LIST**

EXHIBIT LIST

Exhibit No.	Description
A	May 24, 1995, Supplementary Report
B	May 24, 1995, Supplementary Report
C	Jose Melendez Deposition
D	First Revised Joint Statement of Facts to the City
E	January 22, 2024 Correspondence from S. Art to the City
F	Third Revised Joint Statement of Facts to the City
G	Plaintiff’s Response to Defendant City of Chicago’s First Set of Interrogatories
H	Plaintiff’s Response to Defendants’ Post-Trial Motion in <i>Rivera v. Guevara, et al.</i> Exhibit 9 (June 15, 2018 Transcript of Proceedings)
I	Plaintiff’s Response to Defendants’ Post-Trial Motion in <i>Rivera v. Guevara, et al.</i> Exhibit 10 (June 18, 2018 Transcript of Proceedings)
J	January 22, 2024 A. Swaminathan Email Correspondence
K	Excerpt from Permanent Retention File: Aby Gonzalez Witness Canvas
L	Line-Up Report with Positive Identification of Johns
M	October 7, 2019 Josh Tepfer Report of Aby Gonzalez Meetings
N	December 2, 2022 Civil Deposition of Joshua Tepfer
O	Police Report of Ricardo Burgos Interview

P	Declaration of Ricardo Burgos
Q	June 8, 2021 Civil Deposition of Ricardo Burgos
R	Thomas Sierra Deposition
S	Jose Melendez Criminal Trial Testimony
T	Guevara Motion to Suppress Testimony
U	August 21, 2019 Deposition of Reynaldo Guevara
V	Deposition of Ernest Halvorsen in <i>Montanez</i>
W	Plaintiff's Responses to Defendant City of Chicago's First Set of Interrogatories
X	<i>Palmer v. City of Chicago</i> , 562 F. Supp. 1067, 1073 (N.D. Ill. 1983) (J. Shadur)
Y	Deposition of James Hickey in <i>Rivera</i>
Z	James Hickey Testimony in <i>Fields</i> Trial 11/13/16
AA	Deposition of Eric Winstrom in <i>Reyes</i>
BB	Deposition of James Hickey in <i>Fields</i>
CC	James Hickey Testimony in <i>Fields</i> 4/10/14
DD	Deposition of James Hickey in <i>Kluppelberg</i>
EE	S.O. 82-2 and Memo
FF	Declaration and Report of Thomas Tiderington
GG	S.O. 83-1
HH	6/18/2018 <i>Rivera</i> Trial Transcript
II	6/21/2018 <i>Rivera</i> Trial Transcript
JJ	SO 86-3
KK	SO 83-02
LL	Jeffrey Noble Testimony in <i>Fields</i> Trial
MM	Hickey/Spratte Trial Testimony in <i>Rivera</i>
OO	June 2020 OIG Report
PP	Sept. 2021 OIG Follow-Up Report
QQ	Loughran Dep. in Taylor
RR	City's Responses to Request for Production and Requests to Admit in Iglesias litigation (Apr. 7, 2022)
SS	Nathanson Fields Street File
TT	Jacques Rivera Street File
UU	Jacques Rivera Permanent Retention File
VV	Order on Kluppelberg Certificate of Innocence
WW	Michael Brasfield's Report in Jacques v. Guevara et al.
XX	Brasfield Summary of Voluminous Records
YY	Fields Trial Transcript 11/29/16
ZZ	Fields Trial Transcript 11/23/16
AAA	Fields Trial Transcript 12/1/16
BBB	Fields Trial Transcript 11/17/16
CCC	Fields Trial Transcript 11/28/16

DDD	Fields Trial Transcript 12/6/16
EEE	Fields Trial Transcript 12/5/16
FFF	Fields Trial Transcript 12/8/16
GGG	Fields Trial Transcript 12/7/16
HHH	Michael Brasfield's Report in Fields v. City of Chicago et al.
III	Defendants' Rule 26(a)(2) Disclosure
JJJ	Nelson Andreu Report in Sierra v. Guevara et al.
KKK	Deposition of Nelson Andreu in Sierra v. Guevara et al.
LLL	Deposition of Bernard Murray in Sierra v. Guevara et al.
MMM	Deposition of Bernard Murray in Reyes v. Guevara et al.
NNN	Fields Jury Instructions
OOO	Defendants' Combined Post-Trial Motions in Fields
PPP	Plaintiff's Resp. to Defendants' Post-Trial Motions in Fields
QQQ	Defendants' Reply in Support of Post-Trial Motion
RRR	Plaintiff's Resp. to Defendant's Summary Judgement in Jacques v. Rivera et al.
SSS	Jacques Rivera Final Jury Instructions
TTT	Jacques Rivera Judgement
UUU	Jacques Rivera Verdict
VVV	Fields Trial Transcript 11/30/16
WWW	Fields Verdict Summary
XXX	Fields Judgment
YYY	City's Motion for New Trial in Jacques v. Rivera et al.
ZZZ	Plaintiff's Resp. to City's Motion. for New Trial in Jacques v. Rivera et al.
AAAA	City's Reply In Support of Motion for New Trial in Jacques v. Rivera et al.
BBBB	Rivera Civil Trial Transcript 6/15/18
CCCC	Rivera Civil Trial Transcript 6/26/18